UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604

SUBJECT:	CLEAN AIR ACT INSPECTION REPORT EOG Resources Inc., Miegs Wellpad
FROM:	Manojkumar P. Patel, Environmental Engineer AECAB (MI/WI)
THRU:	Sarah Marshall, Section Supervisor AECAB (MI/WI)
TO:	File

BASIC INFORMATION

Facility Name: EOG Resources Inc., Meigs Wellpad

Facility Location: S.W. of Paisley Rd (T411), Big Muskie Drive, Meigs Twp, OH 43727

Date of Inspection: August 30, 2022

EPA Inspector(s):
1. Manojkumar P. Patel, Environmental Engineer
2. Sasha Letuchy, Environmental Engineer

Other Attendees:
1. Nathan Wells, Safety & Environmental Specialist, EOG Resources, Inc.
2. Ben Blackwelder, Production Supridents, EOG Resources, Inc.

Contact Email Address: Nathan_Wells@eogresources.com

Purpose of Inspection: To assess compliance with NSPS Subpart OOOO and the facility's permit

Facility Type: Oil and gas wellpad

Regulations Central to Inspection: New Source Perforamnce Satandards for Crude Oil and Natural Gas Facilities at 40 C.F.R. Part 60, Subpart OOOO and OOOOa

Arrival Time: 3:20 PM EST at 23SE-1HPA and 4:22 PM EST C-1H
Departure Time: 4:10 PM EST at 23SE-1HPA and 4:57 PM EST at C-1H

Inspection Type:

☐ Unannounced Inspection
☒ Announced Inspection

OPENING CONFERENCE

☒ Presented Credentials
☒ Stated authority and purpose of inspection
☒ Small Business Resource Information Sheet not provided. Reason: Not a small business
☒ Provided CBI warning to facility

The following information was obtained verbally from the facility personnel unless otherwise noted.

Company Ownership: In or around June 2022, EOG Resources, Inc. purchased the Miegs well pad from Artex Energy Group, LLC.

Process Description:

Frec Meigs 23SE-1HPA:
At the well pad, an oil/gas/water emulsion is extracted from the formation of the well that each flow into a sand trap, a gas processing unit (GPU), and a three-phase separator. Separated produced water may still contain condensate and is stored in fixed roof tanks. The unstabilized condensate is processed in a stabilizer unit that heats it to drive off vapors, which are sent into the gas line, and stablized condensate and produced water are stored in the fixed roof tanks. The stabilized condensate and produced water tanks are controlled by a vapor recovery unit (VRU) with a combustor as a back up control device. The natural gas is sent to compressors where its pressure is increased to lower its Reid Vapor Pressure, and it is then sent to pressurized natural gas liquid (NGL) tanks before it is sent off site in trucks for further processing. The tanks feed to the combustor, which is the primary emission control device.

The facility has four oil condensate tanks (#1, #2, #3, and #4) and four produced water tanks (#1, #2, #3, and #4). The vapors from the tank headspaces are piped together and transferred to the VRU. Each tank has a "thief" hatch on top for gaining access to the liquid when necessary. The thief hatches are set to relieve pressure due to flashing, working, or breathing emissions from the liquids contained within the tanks gets too high for the piping of the vapor capture system and combustor to accommodate. In addition to the thief hatch, each tank has a pressure relief valve that vents to atmosphere upon release.

Frec Meigs C-1H:
The facility has two oil condensate tanks (#1, and #2) and two produced water tanks (#1, and #2). The vapors from the tank headspaces are piped together and transferred to the VRU. Each tank has a "thief" hatch on top for gaining access to the liquid when necessary. In addition to the thief hatch, each tank has a pressure relief valve that vents to atmosphere upon release.

TOUR INFORMATION

EPA Tour of the Facility: Yes

Data Collected and Observations:
We climbed the tank battery and viewed the thief hatches and pressure relief devices with a FLIR® GF-320 camera (FLIR® Camera). We observed hydrocarbon emissions with the FLIR® camera from thief hatches being used at the facility. We observed that the combustor pilot lit up during the time of inspection.

The facility personnel stated that it replaced and upgrated the thief hatches seals on the tank battery. EPA observed hydrocarbon emissions using FLIR® Camera from the combustor at 23SE-1HPA wellpad while it was combusting gas vapors from the tank battery.

At C-1H wellpad, EPA observed hydrocarbon emissions with the FLIR® camera from thief hatches being used at the facility. We observed that C1H wellpad has 2 gas-oil-water seperator in series.

Photos and/or Videos: were taken during the inspection.

Field Measurements: were not taken during this inspection.

CLOSING CONFERENCE

☒ Provided U.S. EPA point of contact to the facility

Concerns: EPA had concerns about the design and operation of capture and control system at the facility, which was discussed with EOG representatives. EPA's concerns stemmed from observed hydrocarbon emissions from thief hatches, pressure relief devices on the storage tanks, and combustor at the facility.

DIGITAL SIGNATURES

Report Author: Patel, Manojkumar Digitally signed by Patel, Manojkumar Date: 2022.10.28 08:53:53 -05'00'

Section Supervisor: SARAH MARSHALL Digitally signed by SARAH MARSHALL Date: 2022.10.28 09:57:41 -05'00'

APPENDICES AND ATTACHMENTS

APENDIX A: IMAGE LOGS

Facility Name: EOG Resources Inc., Meigs Wellpad
Facility Location: S.W. of Paisley Rd (T411), Big Muskie Drive, Meigs Twp, OH 43727
Date of Inspection: August 30, 2022

APPENDIX A: DIGITAL IMAGE LOG

1. **Inspector Name:** Sasha Letuchy / Manojkumar P. Patel	2. **Archival Record Location: Region 5 Electronic Records**

Image Number	File Name	Date and Time (incl. Time zone and DST)	Latitude and Longitude	Description of Image
1	MOV_2648.mp4	9/1/2022 9:18		Combustor Flare 23SE-1HPA
2	MOV_2649.mp4	9/1/2022 9:19		Combustor Flare 23SE-1HPA
3	MOV_2650.mp4	9/1/2022 9:20		Produced Water Tank #2845 Thief Hatch Venting FLIR Camera 23SE-1HPA
4	MOV_2651.mp4	9/1/2022 9:20		Condensate Tank #2846 Thief Hatch FLIR Camera, 23Se-1HPA
5	MOV_2652.mp4	9/1/2022 9:32		Water Tank -Thief Hatch FLIR Camera C-1H